



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2379

DATE SCANNED

9/7/11

SCANNER NO.

2

SCAN OPERATOR

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 2011

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer
Acting Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickerall *SP*
Compliance Branch

SUBJECT: Reason To Relieve Recommendation - 2010 30 Day Post-General Report
(Unauthorized Filers) For The Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2010 30 Day Post-General Report in accordance with 2 U.S.C. § 434(a). The list is comprised of unauthorized committees that failed to file or timely file the 2010 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report more than five (5) days after the due date but within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2010 through November 22, 2010 (53 days), was reviewed for activity which would have required the filing of a 12 Day Report. If our

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research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 25% (13 days (12G Filing Period)/53 days (30G Filing Period)). The committees identified through this process as failing to file or failing to timely file the 12 Day Pre-General Report were included in the Reason to Believe Recommendation approved by the Commission on March 11, 2011. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Reports based on the estimated levels of activity described above and are included in the attached list.

Recommendation

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports violated 2 U.S.C. § 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Reports.
2. Send the appropriate letters.

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Federal Election Commission
Reason to Believe Circulation Report
2010 POST-GENERAL Not Election Sensitive 12/02/2010 UNAUTH

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|----------------|----------------------|-------------|----|--------------|-----------|-----------|-------------|
| 2344 | C00426445 | ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC) | | DANIEL J. SUTHERBY | \$127,339 | 0 | 12/9/2010 | 7 | \$49,294 | \$340 |
| 2345 | C00392290 | ACE CASH EXPRESS INC PAC | | DAVID DODSON | \$366,424 | 1 | 1/28/2011 | Not Filed | \$8,951 | \$412 |
| 2346 | C00309146 | AMERICAN GAMING ASSOCIATION POLITICAL ACTION COMMITTEE | | JUDY LAYNE PATTERSON | \$159,550 | 0 | 12/10/2010 | 8 | \$18,000 | \$150 |
| 2347 | C00120238 | AMERICAN MOTORCYCLIST POLITICAL ACTION COMMITTEE | | ROBERT CHADDOCK | \$143,557 | 0 | 1/13/2011 | Not Filed | \$32,286 | \$990 |
| 2348 | C00397083 | AMERICAN TELESERVICES ASSOCIATION PAC | | TIMOTHY SEARCY | \$165,037 | 0 | 12/27/2010 | 25 | \$24,652 | \$235 |
| 2349 | C00486821 | AMERICANS FOR NEW LEADERSHIP | | BRENT HUSSON | \$2,513,639 | 0 | 12/20/2010 | 18 | \$202,916 | \$4,250 |
| 2350 | C00177741 | ASPLUNDH TREE EXPERT CO POLITICAL ACTION COMMITTEE (ATE PAC) | | JOSEPH P. DWYER | \$147,400 | 0 | 12/28/2010 | 26 | \$5,500 | \$185 |

| | | | | | | | | | | |
|------|-----------|--------------------------------|--|---------------|-----------|---|------------|----|---------|-------|
| 2354 | C00420125 | CHIANG PATEL AND YERBY INC PAC | | DAVID W. HAYS | \$130,878 | 1 | 12/29/2010 | 27 | \$1,000 | \$200 |
|------|-----------|--------------------------------|--|---------------|-----------|---|------------|----|---------|-------|

| | | | | | | | | | | |
|------|-----------|--|--|-------------------|-----------|---|-----------|-----------|----------|-------|
| 2356 | C00407635 | CONSOLIDATED EDISON INC EMPLOYEES' POLITICAL ACTION COMMITTEE (CEIPAC) | | ROBERT MUCCILO | \$340,795 | 0 | 12/9/2010 | 7 | \$23,564 | \$145 |
| 2357 | C00480228 | CONTINUING AMERICAS STRENGTH AND SECURITY PAC | | RALPH J. STEPHENS | \$246,571 | 0 | 2/16/2011 | Not Filed | \$17,629 | \$550 |

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|---|----------------|-----------------|-----------|----|--------------|-----------|----------------|-------------|
| 2368 | C00357840 | CORINTHIAN COLLEGES INC PAC | | PAUL DE GIUSTI | \$174,077 | 0 | | Not Filed | \$14,506 (est) | \$550 |
| 2369 | C00191288 | D C REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE | | CRAIG ENGLE | \$860,143 | 0 | 12/13/2010 | 11 | \$22,207 | \$165 |
| 2360 | C00442580 | EFFECTIVE LEADERSHIP PAC | | DENISE PETERSON | \$270,842 | 0 | 2/2/2011 | Not Filed | \$27,086 | \$890 |

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|------|-----------|---|--|---------------------|-----------|---|------------|----|---------|-------|
| 2362 | C00400317 | FULTON FINANCIAL CORPORATION PAC | | MICHAEL J. DEPORTER | \$138,105 | 0 | 12/23/2010 | 21 | \$2,677 | \$130 |
| 2363 | C00414805 | GOLDEN PEANUT COMPANY, LLC POLITICAL ACTION COMMITTEE | | JAMES W. DORSETT | \$103,147 | 0 | 12/29/2010 | 27 | \$6,250 | \$190 |

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|------|-----------|---|--|------------------|-----------|---|-----------|-----------|----------|-------|
| 2365 | C00384364 | GREAT LAKES SUGARBEEET GROWERS POLITICAL ACTION COMMITTEE | | RAY VANDRIESSCHE | \$411,604 | 0 | 1/31/2011 | Not Filed | \$12,100 | \$550 |
| 2366 | C00326835 | HARRIS COUNTY REPUBLICAN PARTY | | JOSH FLYNN | \$204,063 | 0 | 12/9/2010 | 7 | \$12,801 | \$145 |
| 2367 | C00437798 | HEARPAC OF HEARING INDUSTRIES ASSOCIATION | | JEEROME RUZICKA | \$272,830 | 0 | 1/4/2011 | Not Filed | \$6,000 | \$330 |

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|------|-----------|--|--|----------------------|-----------|---|------------|-----------|----------|-------|
| 2369 | C00354613 | INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE | | MARTIN MASCULLI | \$135,657 | 2 | 12/29/2010 | 27 | \$3,138 | \$240 |
| 2370 | C00382226 | INTERNATIONAL SECURITIES EXCHANGE PAC | | BRUCE COOPERMAN | \$141,761 | 0 | 1/5/2011 | Not Filed | \$16,535 | \$560 |
| 2371 | C00136739 | IUOE OPERATING ENGINEERS | | JAMES JONES | \$652,331 | 0 | 12/8/2010 | 6 | \$17,818 | \$140 |
| 2372 | C00016444 | KENTUCKY MEDICAL ASSOCIATION PAC (KENTUCKY PHYSICIANS PAC FEDERAL-KPPAC FEDERAL) | | DAVID R. WATKINS, MD | \$239,249 | 0 | 12/9/2010 | 7 | \$17,277 | \$145 |
| 2373 | C00426320 | LIBERTARIAN PARTY OF INDIANA | | TODD SINGER | \$195,010 | 2 | 1/31/2011 | Not Filed | \$12,184 | \$825 |

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|---|----------------|---------------------------|-----------|----|--------------|-----------|----------------|-------------|
| 2374 | C00208322 | MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE | | LYLE J. PARRY | \$132,878 | 0 | | Not Filed | \$18,983 (est) | \$550 |
| 2375 | C00242370 | MCAPITOL MANAGEMENT / MWH AMERICAS PAC | | G. THOMAS PAYNE | \$981,979 | 0 | 12/16/2010 | 14 | \$52,782 | \$1,485 |
| 2376 | C00366922 | METROPOLITAN TRANSPORTATION AUTHORITY POLICE BENEVOLENT ASSOCIATION PAC | | RAYMOND GIMMLER | \$143,080 | 1 | 12/27/2010 | 25 | \$15,515 | \$293 |
| 2378 | C00309468 | MSCPAC | | RAYMOND J. BRIYA | \$106,540 | 0 | 1/6/2011 | Not Filed | \$4,065 | \$250 |
| 2379 | C00166282 | OLD NATIONAL BANK PAC | | BRENDON FALCONER | \$285,467 | 0 | 1/11/2011 | Not Filed | \$16,729 | \$550 |
| 2380 | C00165324 | PHILADELPHIA JOINT BOARD UNITE HERE TIPS | | MILDRED SALDANA | \$105,373 | 2 | 12/17/2010 | 15 | \$54 | \$150 |
| 2382 | C00388694 | PRIORITY PAC | | KEVIN KENNEDY | \$746,535 | 0 | 12/31/2010 | 29 | \$81,635 | \$3,630 |
| 2383 | C00434142 | RENEWABLE ENERGY SYSTEMS AMERICAS INC. PAC (AKA RESPAC) | | DARIN JENSEN | \$118,315 | 0 | 12/22/2010 | 20 | \$8,424 | \$155 |
| 2384 | C00246736 | SEABOARD CORPORATION POLITICAL ACTION COMMITTEE | | DAVID M. DANNOV | \$153,163 | 0 | 12/29/2010 | 27 | \$5,256 | \$190 |
| 2385 | C00432765 | SILK PAC | | LISA MARTINEZ | \$135,541 | 0 | 12/21/2010 | 19 | \$13,750 | \$205 |
| 2386 | C00430371 | SOUTH DAKOTA FIRST | | JOHN MCINTYRE | \$439,135 | 0 | 12/30/2010 | 28 | \$128,592 | \$4,160 |
| 2387 | C00278788 | SUFFOLK COUNTY DETECTIVES ASSN INC. POLITICAL ACTION COMMITTEE | | WILLIAM RATHJEN | \$153,433 | 1 | 12/26/2010 | 24 | \$6,855 | \$218 |
| 2388 | C00488403 | TEXAS TEA PARTY PATRIOTS PAC | | WILLIAM J. OSULLIVAN, JR. | \$237,488 | 0 | 12/30/2010 | 28 | \$101,245 | \$4,160 |

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| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|----------------|---------------------|-----------|----|--------------|-----------|----------------|-------------|
| 2389 | C00279828 | TEXTILE RENTAL SERVICES ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (TRSA PAC) | | THOMAS NEWELL | \$256,991 | 0 | 12/14/2010 | 12 | \$20,169 | \$170 |
| 2390 | C00009357 | THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE | | MITCH GLAZIER | \$230,185 | 0 | 1/10/2011 | Not Filed | \$8,750 | \$330 |
| 2391 | C00335091 | TRANSPORTATION INTERMEDIARIES ASSOCIATION'S TIAPAC | | ROBERT A. VOLT MANN | \$111,950 | 0 | 1/13/2011 | Not Filed | \$9,200 | \$390 |
| 2392 | C00150045 | UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG CARPENTERS LEGIS EMP CMTE | | GLENN MARSHALL | \$289,647 | 0 | 12/10/2010 | 8 | \$30,000 | \$360 |
| 2394 | C00361699 | USINPAC | | MILES C. HOGE | \$159,433 | 0 | | Not Filed | \$39,858 (est) | \$990 |
| 2395 | C00424150 | WOMEN'S CAMPAIGN FORUM | | SIOBHAN BENNETT | \$328,311 | 0 | 2/11/2011 | Not Filed | \$79,905 | \$3,850 |

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BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|--|---|----------|
| In the Matter of |) | |
| |) | |
| Reason To Believe Recommendation - 2010 |) | |
| 30 Day Post-General Report (Unauthorized |) | |
| Filers) For the Administrative Fine |) | |
| Program: |) | |
| ABIOMED INC POLITICAL ACTION |) | AF# 2344 |
| COMMITTEE (ABIOMED PAC), and |) | |
| SUTHERBY, DANIEL J. as treasurer; |) | |
| ACE CASH EXPRESS INC PAC, and |) | AF# 2345 |
| DAVID DODSON as treasurer; |) | |
| AMERICAN GAMING ASSOCIATION |) | AF# 2346 |
| POLITICAL ACTION COMMITTEE, and |) | |
| PATTERSON, JUDY LAYNE as treasurer; |) | |
| AMERICAN MOTORCYCLIST |) | AF# 2347 |
| POLITICAL ACTION COMMITTEE, and |) | |
| CHADDOCK, ROBERT as treasurer; |) | |
| AMERICAN TELESERVICES |) | AF# 2348 |
| ASSOCIATION PAC, and SEARCY, TIM |) | |
| MR. as treasurer; |) | |
| AMERICANS FOR NEW LEADERSHIP, |) | AF# 2349 |
| and HUSSON, BRENT as treasurer; |) | |
| ASPLUNDH TREE EXPERT CO |) | AF# 2350 |
| POLITICAL ACTION COMMITTEE |) | |
| (ATE PAC), and DWYER, JOSEPH P as |) | |
| treasurer; |) | |
| BI-COUNTY POLITICAL ACTION |) | AF# 2351 |
| COMMITTEE (FKA SUFFOLK PAC), and |) | |
| IRA LAMEL as treasurer; |) | |
| | | |
| | | |
| CHIANG PATEL AND YERBY INC PAC, |) | AF# 2354 |
| and DAVID W HAYS as treasurer; |) | |

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CONSOLIDATED EDISON INC) AF# 2356
EMPLOYEES' POLITICAL ACTION)
COMMITTEE (CEIPAC), and MUCCILO,)
ROBERT as treasurer;)
CONTINUING AMERICA'S STRENGTH) AF# 2357
AND SECURITY PAC, and STEPHENS,)
RALPH J. as treasurer;)
CORINTHIAN COLLEGE INC PAC, and) AF# 2358
DE GIUSTI, PAUL as treasurer;)
D C REPUBLICAN COMMITTEE) AF# 2359
FEDERAL CAMPAIGN COMMITTEE,)
and ENGLE, CRAIG as treasurer;)
EFFECTIVE LEADERSHIP PAC, and) AF# 2360
DENISE PETERSON as treasurer;)

FULTON FINANCIAL CORPORATION) AF# 2362
PAC, and MICHAEL J DEPORTER as)
treasurer;)
GOLDEN PEANUT COMPANY, LLC) AF# 2363
POLITICAL ACTION COMMITTEE, and)
JAMES W DORSETT as treasurer;)

GREAT LAKES SUGARBEET) AF# 2365
GROWERS POLITICAL ACTION)
COMMITTEE, and VANDRIESSCHE,)
RAY as treasurer;)
HARRIS COUNTY REPUBLICAN) AF# 2366
PARTY, and FLYNN, JOSH as treasurer;)
HEARPAC OF HEARING INDUSTRIES) AF# 2367
ASSOCIATION, and RUZICKA, JEROME)
as treasurer;)

INT LONGSHOREMENS ASSOC (ILA)) AF# 2369
LOCAL 1291 POLITICAL ACTION)
COMMITTEE, and MARTIN MASCUILLI)
as treasurer;)

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INTERNATIONAL SECURITIES) AF# 2370
EXCHANGE PAC, and COOPERMAN,)
BRUCE as treasurer;)
IUOE OPERATING ENGINEERS, and) AF# 2371
JAMES JONES as treasurer;)
KENTUCKY MEDICAL ASSOCIATION) AF# 2372
PAC (KENTUCKY PHYSICIANS PAC)
FEDERAL-KPPAC FEDERAL), and)
WATKINS, DAVID R MD as treasurer;)
LIBERTARIAN PARTY OF INDIANA,) AF# 2373
and TODD SINGER as treasurer;)
MANAGEMENT AND TRAINING) AF# 2374
CORPORATION POLITICAL ACTION)
COMMITTEE, and LYLE J PARRY as)
treasurer;)
MCAPITOL MANAGEMENT / MWH) AF# 2375
AMERICAS PAC, and PAYNE, G.)
THOMAS as treasurer;)
METROPOLITAN TRANSPORTATION) AF# 2376
AUTHORITY POLICE BENEVOLENT)
ASSOCIATION PAC, and RAYMOND)
GIMMLER as treasurer;)

MSCPAC, and RAYMOND J BRIYA as) AF# 2378
treasurer;)
OLD NATIONAL BANK PAC, and) AF# 2379
FALCONER, BRENDON as treasurer;)
PHILADELPHIA JOINT BOARD UNITE) AF# 2380
HERE TIPS, and MS MILDRED)
SALDANA as treasurer;)

PRIORITY PAC, and KENNEDY, KEVIN) AF# 2382
MR. as treasurer;)
RENEWABLE ENERGY SYSTEMS) AF# 2383
AMERICAS INC. PAC (AKA RESPAC),)
and JENSEN, DARIN as treasurer;)
SEABOARD CORPORATION) AF# 2384
POLITICAL ACTION COMMITTEE, and)
DAVID M DANNON as treasurer;)
SILK PAC, and LISA MARTINEZ as) AF# 2385
treasurer;)

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| | | |
|------------------------------------|---|----------|
| SOUTH DAKOTA FIRST, and |) | AF# 2386 |
| MCINTYRE, JOHN as treasurer; |) | |
| SUFFOLK COUNTY DETECTIVES |) | AF# 2387 |
| ASSN INC., POLITICAL ACTION |) | |
| COMMITTEE, and WILLIAM RATHJEN, |) | |
| TREASURER as treasurer; |) | |
| TEXAS TEA PARTY PATRIOTS PAC, |) | AF# 2388 |
| and WILLIAM J O'SULLIVAN JR as |) | |
| treasurer; |) | |
| TEXTILE RENTAL SERVICES |) | AF# 2389 |
| ASSOCIATION OF AMERICA |) | |
| POLITICAL ACTION COMMITTEE |) | |
| (TRSAPAC), and NEWELL, THOMAS as |) | |
| treasurer; |) | |
| THE RECORDING INDUSTRY |) | AF# 2390 |
| ASSOCIATION OF AMERICA |) | |
| POLITICAL ACTION COMMITTEE, and |) | |
| GLAZIER, MITCH as treasurer; |) | |
| TRANSPORTATION INTERMEDIARIES |) | AF# 2391 |
| ASSOCIATION'S TIAPAC, and ROBERT |) | |
| A VOLTSMANN as treasurer; |) | |
| UNITED BROTHERHOOD OF |) | AF# 2392 |
| CAREENTERS/JOINERS OF AMER NEW |) | |
| ENGLAND REG CARPENTERS LEGIS |) | |
| EMP CMTE, and GLENN MARSHALL as |) | |
| treasurer; |) | |
| <hr/> | | |
| USINPAC, and HOGE, MILES C. MR. as |) | AF# 2394 |
| treasurer; |) | |
| WOMEN'S CAMPAIGN FORUM, and |) | AF# 2395 |
| SIOBHAN BENNETT as treasurer; |) | |

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 25, 2011 the Commission took the following actions on the Reason To Believe Recommendation - 2010 30 Day Post-General Report (Unauthorized Filers) For the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 21, 2011, on the following committees:

AF#2344 Decided by a vote of 6-0 to: (1) find reason to believe that ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC), and SUTHERBY, DANIEL J. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2345 Decided by a vote of 6-0 to: (1) find reason to believe that ACE CASH EXPRESS INC PAC, and DAVID DODSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2346 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN GAMING ASSOCIATION POLITICAL ACTION COMMITTEE, and PATTERSON, JUDY LAYNE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2347 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN MOTORCYCLIST POLITICAL ACTION COMMITTEE, and CHADDOCK, ROBERT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2348 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN TELESERVICES ASSOCIATION PAC, and SEARCY, TIM MR. as treasurer violated 2

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U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2349 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICANS FOR NEW LEADERSHIP, and HUSSON, BRENT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2350 Decided by a vote of 6-0 to: (1) find reason to believe that ASPLUNDH TREE EXPERT CO POLITICAL ACTION COMMITTEE (ATE PAC), and DWYER, JOSEPH P as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2351 Decided by a vote of 6-0 to: (1) find reason to believe that BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC), and IRA LAMEL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2354 Decided by a vote of 6-0 to: (1) find reason to believe that CHIANG PATEL AND YERBY INC PAC, and DAVID W HAYS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2356 Decided by a vote of 6-0 to: (1) find reason to believe that CONSOLIDATED EDISON INC EMPLOYEES' POLITICAL ACTION COMMITTEE (CEIPAC), and MUCCILO, ROBERT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2357 Decided by a vote of 6-0 to: (1) find reason to believe that CONTINUING AMERICA'S STRENGTH AND SECURITY PAC, and STEPHENS, RALPH J. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2358 Decided by a vote of 6-0 to: (1) find reason to believe that CORINTHIAN COLLEGES INC PAC, and DE GIUSTI, PAUL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2359 Decided by a vote of 6-0 to: (1) find reason to believe that D C REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE, and INGLE, CRAIG as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2360 Decided by a vote of 6-0 to: (1) find reason to believe that EFFECTIVE LEADERSHIP PAC, and DENISE PETERSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2362 Decided by a vote of 6-0 to: (1) find reason to believe that FULTON FINANCIAL CORPORATION PAC, and MICHAEL J DEPORTER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2363 Decided by a vote of 6-0 to: (1) find reason to believe that GOLDEN PEANUT COMPANY, LLC POLITICAL ACTION COMMITTEE, and JAMES W DORSETT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2365 Decided by a vote of 6-0 to: (1) find reason to believe that GREAT LAKES SUGARBEET GROWERS POLITICAL ACTION COMMITTEE, and VANDRIESSCHE, RAY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2366 Decided by a vote of 6-0 to: (1) find reason to believe that HARRIS COUNTY REPUBLICAN PARTY, and FLYNN, JOSH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2367 Decided by a vote of 6-0 to: (1) find reason to believe that HEARPAC OF HEARING INDUSTRIES ASSOCIATION, and RUZICKA, JEROME as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2369 Decided by a vote of 6-0 to: (1) find reason to believe that INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE, and MARTIN MASCULLI as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2370 Decided by a vote of 6-0 to: (1) find reason to believe that INTERNATIONAL SECURITIES EXCHANGE PAC, and COOPERMAN, BRUCE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2371 Decided by a vote of 6-0 to: (1) find reason to believe that IUOE OPERATING ENGINEERS, and JAMES JONES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2372 Decided by a vote of 6-0 to: (1) find reason to believe that KENTUCKY MEDICAL ASSOCIATION PAC (KENTUCKY PHYSICIANS PAC FEDERAL-KPPAC FEDERAL), and WATKINS, DAVID R MD as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2373 Decided by a vote of 6-0 to: (1) find reason to believe that LIBERTARIAN PARTY OF INDIANA, and TODD SINGER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2374 Decided by a vote of 6-0 to: (1) find reason to believe that MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE, and LYLE J PARRY as treasurer violated 2 U.S.C. 434(a) and make a

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preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2375 Decided by a vote of 6-0 to: (1) find reason to believe that MCAPITOL MANAGEMENT / MWH AMERICAS PAC, and PAYNE, G. THOMAS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2376 Decided by a vote of 6-0 to: (1) find reason to believe that METROPOLITAN TRANSPORTATION AUTHORITY POLICE BENEVOLENT ASSOCIATION PAC, and RAYMOND GIMMLER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2378 Decided by a vote of 6-0 to: (1) find reason to believe that MSCPAC, and RAYMOND J BRIYA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2379 Decided by a vote of 6-0 to: (1) find reason to believe that OLD NATIONAL BANK PAC, and FALCONER, BRENDON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2380 Decided by a vote of 6-0 to: (1) find reason to believe that PHILADELPHIA JOINT BOARD UNITED HERE TIPS, and MS MILDRED SALDANA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2382 Decided by a vote of 6-0 to: (1) find reason to believe that PRIORITY PAC, and KENNEDY, KEVIN MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2383 Decided by a vote of 6-0 to: (1) find reason to believe that RENEWABLE ENERGY SYSTEMS AMERICAS INC. PAC (AKA RESPAC), and JENSEN, DARIN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2384 Decided by a vote of 6-0 to: (1) find reason to believe that SEABOARD CORPORATION POLITICAL ACTION COMMITTEE, and DAVID M DANNOV as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2385 Decided by a vote of 6-0 to: (1) find reason to believe that SILK PAC, and LISA MARTINEZ as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2386 Decided by a vote of 6-0 to: (1) find reason to believe that SOUTH DAKOTA FIRST, and MCINTYRE, JOHN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2387 Decided by a vote of 6-0 to: (1) find reason to believe that SUFFOLK COUNTY DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE, and WILLIAM RATHJEN, TREASURER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2388 Decided by a vote of 6-0 to: (1) find reason to believe that TEXAS TEA PARTY PATRIOTS.PAC, and WILLIAM J O'SULLIVAN JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2389 Decided by a vote of 6-0 to: (1) find reason to believe that TEXTILE RENTAL SERVICES ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (TRSAPAC), and NEWELL, THOMAS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2390 Decided by a vote of 6-0 to: (1) find reason to believe that THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE, and GLAZIER, MITCH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2391 Decided by a vote of 6-0 to: (1) find reason to believe that TRANSPORTATION INTERMEDIARIES ASSOCIATION'S TIAPAC, and ROBERT A VOLTSMANN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2392 Decided by a vote of 6-0 to: (1) find reason to believe that UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG CARPENTERS LEGIS EMP CMTE, and GLENN MARSHALL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2394 Decided by a vote of 6-0 to: (1) find reason to believe that USINPAC, and HOGE, MILES C. MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2395 Decided by a vote of 6-0 to: (1) find reason to believe that WOMEN'S CAMPAIGN FORUM, and SIOBHAN BENNETT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 28, 2011
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 2011

Brendon Falconer, in official capacity as Treasurer
Old National Bank PAC
1 Main Street
Evansville, IN 47708

C00165282
AF#: 2379

Dear Mr. Falconer:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period through November 22, 2010, shall be filed no later than December 2, 2010. 2 U.S.C. § 434(a). Because records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date, it is considered not filed for the purpose of calculating the civil money penalty.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On March 25, 2011, the FEC found that there is reason to believe ("RTB") that Old National Bank PAC and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before December 2, 2010. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$550. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment of \$550 is due within forty (40) days of the finding, or by May 4, 2011, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$16,729

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purpose of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

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If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or May 4, 2011. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Old National Bank PAC and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

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action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Cynthia L. Bauerly
Chair

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ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at RTB is \$550 for the 2010 Post-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by May 4, 2011. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Old National Bank PAC

FEC ID#: C00165282

AF#: 2379

PAYMENT DUE DATE: May 4, 2011

PAYMENT AMOUNT DUE: \$550

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 27, 2011

MEMORANDUM

TO: The Commission

THROUGH: Alec Paimer
Acting Staff Director

FROM: Patricia Carmona *NUI for PC*
Chief Compliance Officer

Debbie Chacona *NUI for DC*
Assistant Staff Director
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickeral *JP*
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the
2010 30 Day Post-General Report (Unauthorized Committees)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2010 30 Day Post-General Report (Unauthorized Committees). The first list represents the committees that have paid the civil money penalty and the second list represents those committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, two (2) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty and will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. Both committees paid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference. An overview of each of these cases has been provided below.

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Texas Tea Party Patriots PAC (AF 2388) filed an Amended 2010 30 Day Post-General Report after the RTB finding and disclosed a level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$94,728 (previously calculated to be \$101,245), thus the fine would be lowered from \$4,160 to \$3,520. The committee paid \$4,160 (see first list); therefore, we will issue a refund for the difference (\$640).

USINPAC (AF 2394) filed the 2010 30 Day Post-General Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$9,747 (previously estimated to be \$39,858), thus the fine would be lowered from \$990 to \$330. The committee paid \$990 (see first list); therefore, we will issue a refund for the difference (\$660).

For your information, three (3) committees detailed below designated a new Treasurer after the RTB finding:

- American Teleservices Association PAC (AF 2348) filed an Amended Statement of Organization after the RTB finding designating Robert Kobek as Treasurer (see first list).
- Renewable Energy Systems Americas Inc. PAC (aka RESPAC) filed an Amended Statement of Organization after the RTB finding designating Lindsay Murray Miller as Treasurer (see first list).
- USINPAC (AF 2210) filed an Amended Statement of Organization after the RTB finding designating Sanjay K. Puri as Treasurer (see first list).

RAD Recommendation

- (1) Make final determination that the political committees and their treasurers on the attached reports violated 2 U.S.C. § 434(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

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8/27/2011 1:43 PM

Federal Election Commission
FD Circulation Report Fine Paid
2010 POST-GENERAL Not Election Sensitive 12/02/2010 UNAUTH

| AF# | Committee Name | Candidate Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|--|----------------|--------------|----------------------|--------------|-----------|-----------|----|------------|-------------|---------------------|------------|-------------|
| 2344 | ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC) | | C00428445 | DANIEL J. SUTHERBY | 12/08/2010 | 7 | \$49,294 | 0 | 03/25/2011 | \$340 | \$340 | 04/04/2011 | \$340 |
| 2345 | ACE CASH EXPRESS INC PAC | | C00392290 | DAVID DODSON | 01/28/2011 | Not Filed | \$8,951 | 1 | 03/25/2011 | \$412 | \$412 | 04/25/2011 | \$412 |
| 2346 | AMERICAN GAMING ASSOCIATION POLITICAL ACTION COMMITTEE | | C00309146 | JUDY LAYNE PATTERSON | 12/10/2010 | 8 | \$18,000 | 0 | 03/25/2011 | \$150 | \$150 | 04/11/2011 | \$150 |
| 2347 | AMERICAN MOTORCYCLIST POLITICAL ACTION COMMITTEE | | C00120238 | ROBERT CHADDOCK | 01/13/2011 | Not Filed | \$32,285 | 0 | 03/25/2011 | \$990 | \$990 | 05/02/2011 | \$990 |
| 2348 | AMERICAN TELESERVICES ASSOCIATION PAC | | C00397083 | ROBERT KOBEK | 12/27/2010 | 25 | \$24,652 | 0 | 03/25/2011 | \$235 | \$235 | 04/08/2011 | \$235 |
| 2349 | AMERICANS FOR NEW LEADERSHIP | | C00485921 | BRENT HUSSON | 12/20/2010 | 18 | \$238,413 | 0 | 03/25/2011 | \$4,250 | \$4,250 | 05/08/2011 | \$4,250 |
| 2350 | ASPLUNDH TREE EXPERT CO POLITICAL ACTION COMMITTEE (ATE PAC) | | C00177741 | JOSEPH P. DWYER | 12/28/2010 | 26 | \$5,500 | 0 | 03/25/2011 | \$185 | \$185 | 05/04/2011 | \$185 |
| 2351 | BICOUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC) | | C00204388 | IRA LAMEL | 12/23/2010 | 21 | \$22,500 | 1 | 03/25/2011 | \$288 | \$288 | 05/04/2011 | \$288 |
| 2354 | CHIANG PATEL AND YERBY INC PAC | | C00420125 | DAVID W. HAYS | 12/29/2010 | 27 | \$1,000 | 1 | 03/25/2011 | \$200 | \$200 | 04/07/2011 | \$200 |
| 2356 | CONSOLIDATED EDISON INC EMPLOYEES' POLITICAL ACTION COMMITTEE (CEIPAC) | | C00407635 | ROBERT MUCCILO | 12/09/2010 | 7 | \$23,584 | 0 | 03/25/2011 | \$145 | \$145 | 04/28/2011 | \$145 |
| 2357 | CONTINUING AMERICA'S STRENGTH AND SECURITY PAC | | C00480228 | RALPH J. STEPHENS | 02/16/2011 | Not Filed | \$17,629 | 0 | 03/25/2011 | \$550 | \$550 | 04/08/2011 | \$550 |
| 2358 | CORINTHIAN COLLEGES INC PAC | | C00357840 | PAUL DE GIUSTI | 03/23/2011 | Not Filed | \$38,700 | 0 | 03/25/2011 | \$550 | \$550 | 05/04/2011 | \$550 |
| 2359 | D C REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE | | C00191288 | CRAIG ENGLE | 12/13/2010 | 11 | \$22,207 | 0 | 03/25/2011 | \$165 | \$165 | 05/08/2011 | \$165 |
| 2360 | EFFECTIVE LEADERSHIP PAC | | C00442598 | DENISE PETERSON | 02/02/2011 | Not Filed | \$27,085 | 0 | 03/25/2011 | \$990 | \$990 | 05/05/2011 | \$990 |
| 2362 | FULTON FINANCIAL CORPORATION PAC | | C00400317 | MICHAEL J. DEPORTER | 12/23/2010 | 21 | \$2,677 | 0 | 03/25/2011 | \$130 | \$130 | 04/18/2011 | \$130 |
| 2363 | GOLDEN PEANUT COMPANY, LLC POLITICAL ACTION COMMITTEE | | C00414805 | JAMES W. DORSETT | 12/29/2010 | 27 | \$8,250 | 0 | 03/25/2011 | \$190 | \$190 | 04/04/2011 | \$190 |
| 2365 | GREAT LAKES SUGARBEEET GROWERS POLITICAL ACTION COMMITTEE | | C00384354 | RAY VANDRIESSCHE | 01/31/2011 | Not Filed | \$12,100 | 0 | 03/25/2011 | \$550 | \$550 | 05/02/2011 | \$550 |
| 2366 | HARRIS COUNTY REPUBLICAN PARTY | | C00326835 | JOSH FLYNN | 12/09/2010 | 7 | \$12,801 | 0 | 03/25/2011 | \$145 | \$145 | 05/03/2011 | \$145 |

| AF# | Committee Name | Candidate Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|---|----------------|--------------|----------------------------|--------------|-----------|-----------|----|------------|-------------|---------------------|------------|-------------|
| 2367 | HEARPAC OF HEARING INDUSTRIES ASSOCIATION | | C00437798 | JEROME RUZICKA | 01/04/2011 | Not Filed | \$6,000 | 0 | 03/25/2011 | \$330 | \$330 | 04/19/2011 | \$330 |
| 2369 | INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE | | C00354613 | MARTIN MASCUILLI | 12/29/2010 | 27 | \$3,138 | 2 | 03/25/2011 | \$240 | \$240 | 05/02/2011 | \$240 |
| 2370 | INTERNATIONAL SECURITIES EXCHANGE PAC | | C00382226 | BRUCE COOPERMAN | 01/05/2011 | Not Filed | \$16,535 | 0 | 03/25/2011 | \$550 | \$550 | 04/25/2011 | \$550 |
| 2371 | IUOE OPERATING ENGINEERS | | C00136739 | JAMES JONES | 12/08/2010 | 6 | \$17,818 | 0 | 03/25/2011 | \$140 | \$140 | 04/27/2011 | \$140 |
| 2372 | KENTUCKY MEDICAL ASSOCIATION PAC (KENTUCKY PHYSICIANS PAC FEDERAL-KPPAC FEDERAL) | | C00016444 | DAVID R. WATKINS, MD | 12/09/2010 | 7 | \$17,277 | 0 | 03/25/2011 | \$145 | \$145 | 05/04/2011 | \$145 |
| 2373 | LIBERTARIAN PARTY OF INDIANA | | C00426320 | TODD SINGER | 01/31/2011 | Not Filed | \$12,184 | 2 | 03/25/2011 | \$825 | \$825 | 04/08/2011 | \$825 |
| 2374 | MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE | | C00218322 | LYLE J. PARRY | 04/19/2011 | Not Filed | \$20,832 | 0 | 03/25/2011 | \$550 | \$550 | 05/04/2011 | \$550 |
| 2375 | MCAPITOL MANAGEMENT / MWH AMERICAS PAC | | C00243270 | G. THOMAS PAYNE | 12/18/2010 | 14 | \$52,782 | 0 | 03/25/2011 | \$1,485 | \$1,485 | 04/18/2011 | \$1,485 |
| 2376 | METROPOLITAN TRANSPORTATION AUTHORITY POLICE BENEVOLENT ASSOCIATION PAC | | C00366922 | RAYMOND GIMMLER | 12/27/2010 | 25 | \$15,515 | 1 | 03/25/2011 | \$293 | \$293 | 05/04/2011 | \$293 |
| 2378 | MSPAC | | C00309468 | RAYMOND J. BRIYA | 01/08/2011 | Not Filed | \$4,085 | 0 | 03/25/2011 | \$250 | \$250 | 04/08/2011 | \$250 |
| 2379 | OLD NATIONAL BANK PAC | | C00168282 | BRENNON FALCONER | 01/11/2011 | Not Filed | \$16,729 | 0 | 03/25/2011 | \$550 | \$550 | 05/04/2011 | \$550 |
| 2380 | PHILADELPHIA JOINT BOARD UNITE HERE TIPS | | C00165324 | MILDRED SALDANA | 12/17/2010 | 15 | \$54 | 2 | 03/25/2011 | \$150 | \$150 | 05/03/2011 | \$150 |
| 2382 | PRIORITY PAC | | C00388894 | KEVIN KENNEDY | 12/31/2010 | 29 | \$81,635 | 0 | 03/25/2011 | \$3,630 | \$3,630 | 05/03/2011 | \$3,630 |
| 2383 | RENEWABLE ENERGY SYSTEMS AMERICAS INC. PAC (AKA RESPAC) | | C00434142 | LINDSAY MURRAY MILLER | 12/22/2010 | 20 | \$8,424 | 0 | 03/25/2011 | \$155 | \$155 | 05/04/2011 | \$155 |
| 2384 | SEABOARD CORPORATION POLITICAL ACTION COMMITTEE | | C00248736 | DAVID M. DANNON | 12/29/2010 | 27 | \$5,256 | 0 | 03/25/2011 | \$190 | \$190 | 04/22/2011 | \$190 |
| 2385 | SILK PAC | | C00432785 | LISA MARTINEZ | 12/21/2010 | 19 | \$13,750 | 0 | 03/25/2011 | \$205 | \$205 | 04/12/2011 | \$205 |
| 2386 | SOUTH DAKOTA FIRST SUFFOLK COUNTY | | C00430371 | JOHN MCINTYRE | 12/30/2010 | 26 | \$128,592 | 0 | 03/25/2011 | \$4,160 | \$4,160 | 05/02/2011 | \$4,160 |
| 2387 | DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE | | C00276788 | WILLIAM RATHJEN | 12/28/2010 | 24 | \$6,855 | 1 | 03/25/2011 | \$218 | \$218 | 04/18/2011 | \$218 |
| 2388 | TEXAS TEA PARTY PATRIOTS PAC | | C00489403 | WILLIAM J. O'SULLIVAN, JR. | 12/30/2010 | 28 | \$94,728 | 0 | 03/25/2011 | \$4,160 | \$3,520 | 5/2/2011 | \$4,160* |
| 2389 | TEXTILE RENTAL SERVICES ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (TRSAPAC) | | C00279828 | THOMAS NEWELL | 12/14/2010 | 12 | \$20,169 | 0 | 03/25/2011 | \$170 | \$170 | 04/18/2011 | \$170 |

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| AF# | Committee Name | Candidate Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|--|----------------|--------------|---------------------|--------------|-----------|----------|----|------------|-------------|---------------------|------------|-------------|
| 2390 | THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE | | C00009357 | MITCH GLAZIER | 01/10/2011 | Not Filed | \$8,750 | 0 | 03/25/2011 | \$330 | \$330 | 04/18/2011 | \$330 |
| 2391 | TRANSPORTATION INTERMEDIARIES ASSOCIATION'S TIAPAC | | C00335091 | ROBERT A. VOLT MANN | 01/13/2011 | Not Filed | \$9,200 | 0 | 03/25/2011 | \$330 | \$330 | 04/04/2011 | \$330 |
| 2392 | UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG CARPENTERS LEGIS EMP CMTE | | C00150045 | GLENN MARSHALL | 12/10/2010 | 8 | \$30,000 | 0 | 03/25/2011 | \$380 | \$380 | 05/09/2011 | \$380 |
| 2394 | USINPAC | | C00381698 | SANJAY K. PURI | 04/08/2011 | Not Filed | \$9,747 | 0 | 03/25/2011 | \$990 | \$330 | 4/21/2011 | \$990* |
| 2395 | WOMEN'S CAMPAIGN FORUM | | C00424150 | SIQBHAN BENNETT | 02/01/2011 | Not Filed | \$75,905 | 0 | 03/25/2011 | \$3,850 | \$3,850 | 05/04/2011 | \$3,850 |

* This committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty and will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. This committee paid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

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Federal Election Commission
FD Circulation Report Fine Not Paid
2010 POST-GENERAL Not Election Sensitive 12/02/2010 UNAUTH

| AF# | Committee Name | Candidate Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Days Since | FD Penalty |
|-----|----------------|----------------|--------------|-----------|--------------|-----------|-----|----|----------|-------------|------------|------------|
| | | | | | | | | | | | | |

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BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---------------------------------------|---|----------|
| In the Matter of |) | |
| |) | |
| Administrative Fine Program - Final |) | |
| Determination Recommendation 2010 30 |) | |
| Day Post-General Report (Unauthorized |) | |
| Committees): |) | |
| PRIORITY PAC, and KENNEDY, KEVIN |) | AF# 2382 |
| MR. as treasurer; |) | |
| SOUTH DAKOTA FIRST, and |) | AF# 2386 |
| MCINTYRE, JOHN as treasurer; |) | |
| TEXAS TEA PARTY PATRIOTS PAC, |) | AF# 2388 |
| and WILLIAM J O'SULLIVAN JR as |) | |
| treasurer; |) | |
| CHIANG PATEL AND YERBY INC PAC, |) | AF# 2354 |
| and DAVID W HAYS as treasurer; |) | |
| GOLDEN PEANUT COMPANY, LLC |) | AF# 2363 |
| POLITICAL ACTION COMMITTEE, and |) | |
| JAMES W DORSETT as treasurer; |) | |
| INT LONGSHOREMENS ASSOC (ILA) |) | AF# 2369 |
| LOCAL 1291 POLITICAL ACTION |) | |
| COMMITTEE, and MARTIN MASCUILLI |) | |
| as treasurer; |) | |
| SEABOARD CORPORATION |) | AF# 2384 |
| POLITICAL ACTION COMMITTEE, and |) | |
| DAVID M DANNON as treasurer; |) | |
| ASPLUNDH TREE EXPERT CO |) | AF# 2350 |
| POLITICAL ACTION COMMITTEE |) | |
| (ATE PAC), and DWYER, JOSEPH P as |) | |
| treasurer; |) | |
| AMERICAN TELESERVICES |) | AF# 2348 |
| ASSOCIATION PAC, and KOBEL, |) | |
| ROBERT as treasurer; |) | |
| METROPOLITAN TRANSPORTATION |) | AF# 2376 |
| AUTHORITY POLICE BENEVOLENT |) | |
| ASSOCIATION PAC, and RAYMOND |) | |
| GIMMLER as treasurer; |) | |

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Certification for Administrative Fines
June 29, 2011

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| | | |
|-------------------------------------|---|----------|
| SUFFOLK COUNTY DETECTIVES |) | AF# 2387 |
| ASSN INC., POLITICAL ACTION |) | |
| COMMITTEE, and WILLIAM RATHJEN, |) | |
| TREASURER as treasurer; |) | |
| BI-COUNTY POLITICAL ACTION |) | AF# 2351 |
| COMMITTEE (FKA SUFFOLK PAC), and |) | |
| IRA LAMEL as treasurer; |) | |
| FULTON FINANCIAL CORPORATION |) | AF# 2362 |
| PAC, and MICHAEL J DEPORTER as |) | |
| treasurer; |) | |
| RENEWABLE ENERGY SYSTEMS |) | AF# 2383 |
| AMERICAS INC. PAC (AKA RESPAC), |) | |
| and MILLER, LINDSAY MURRAY as |) | |
| treasurer; |) | |
| SILK PAC, and LISA MARTINEZ as |) | AF# 2385 |
| treasurer; |) | |
| AMERICANS FOR NEW LEADERSHIP, |) | AF# 2349 |
| and BRENT HUSSON as treasurer; |) | |
| PHILADELPHIA JOINT BOARD UNITE |) | AF# 2380 |
| HERE TIPS, and MS MILDRED |) | |
| SALDANA as treasurer; |) | |
| MCAPITOL MANAGEMENT / MWH |) | AF# 2375 |
| AMERICAS PAC, and PAYNE, G. |) | |
| THOMAS as treasurer; |) | |
| TEXTILE RENTAL SERVICES |) | AF# 2389 |
| ASSOCIATION OF AMERICA |) | |
| POLITICAL ACTION COMMITTEE |) | |
| (TRSAPAC), and NEWELL, THOMAS as |) | |
| treasurer; |) | |
| D C REPUBLICAN COMMITTEE |) | AF# 2359 |
| FEDERAL CAMPAIGN COMMITTEE, |) | |
| and ENGLE, CRAIG as treasurer; |) | |
| AMERICAN GAMING ASSOCIATION |) | AF# 2346 |
| POLITICAL ACTION COMMITTEE, and |) | |
| PATTERSON, JUDY LAYNE as treasurer; |) | |
| UNITED BROTHERHOOD OF |) | AF# 2392 |
| CARPENTERS/JOINERS OF AMER NEW |) | |
| ENGLAND REG CARPENTERS LEGIS |) | |
| EMP CMTE, and GLENN MARSHALL as |) | |
| treasurer; |) | |
| ABIOMED INC POLITICAL ACTION |) | AF# 2344 |
| COMMITTEE (ABIOMED PAC), and |) | |
| SUTHERBY, DANIEL J. as treasurer; |) | |

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Federal Election Commission
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CONSOLIDATED EDISON INC) AF# 2356
EMPLOYEES' POLITICAL ACTION)
COMMITTEE (CEIPAC), and MUCCILO,)
ROBERT as treasurer;)
HARRIS COUNTY REPUBLICAN) AF# 2366
PARTY, and FLYNN, JOSH as treasurer;)
KENTUCKY MEDICAL ASSOCIATION) AF# 2372
PAC (KENTUCKY PHYSICIANS PAC)
FEDERAL-KPPAC FEDERAL), and)
WATKINS, DAVID R MD as treasurer;)

IUOE OPERATING ENGINEERS, and) AF# 2371
JAMES JONES as treasurer;)
ACE CASH EXPRESS INC PAC, and) AF# 2345
DAVID DODSON as treasurer;)
AMERICAN MOTORCYCLIST) AF# 2347
POLITICAL ACTION COMMITTEE, and)
CHADDOCK, ROBERT as treasurer;)
CONTINUING AMERICA'S STRENGTH) AF# 2357
AND SECURITY PAC, and STEPHENS,)
RALPH J. as treasurer;)
CORINTHIAN COLLEGES INC PAC, and) AF# 2358
DE GIUSTI, PAUL as treasurer;)
EFFECTIVE LEADERSHIP PAC, and) AF# 2360
DENISE PETERSON as treasurer;)
GREAT LAKES SUGARBET) AF# 2365
GROWERS POLITICAL ACTION)
COMMITTEE, and VANDRIESSCHE,)
RAY as treasurer;)
HEARPAC OF HEARING INDUSTRIES) AF# 2367
ASSOCIATION, and RUZICKA, JEROME)
as treasurer;)
INTERNATIONAL SECURITIES) AF# 2370
EXCHANGE PAC, and COOPERMAN,)
BRUCE as treasurer;)
LIBERTARIAN PARTY OF INDIANA,) AF# 2373
and TODD SINGER as treasurer;)
MANAGEMENT AND TRAINING) AF# 2374
CORPORATION POLITICAL ACTION)
COMMITTEE, and LYLE J PARRY as)
treasurer:)

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MSCPAC, and RAYMOND J BRIYA as) AF# 2378
treasurer;)
OLD NATIONAL BANK PAC, and) AF# 2379
BRENDON FALCONER as treasurer;)
THE RECORDING INDUSTRY) AF# 2390
ASSOCIATION OF AMERICA)
POLITICAL ACTION COMMITTEE, and)
GLAZIER, MITCH as treasurer;)
TRANSPORTATION INTERMEDIARIES) AF# 2391
ASSOCIATION'S TIAPAC, and ROBERT)
A VOLTSMANN as treasurer;)
USINPAC, and PURI, SANJAY K as) AF# 2394
treasurer;)
WOMEN'S CAMPAIGN FORUM, and) AF# 2395
SIOBHAN BENNETT as treasurer;)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 29, 2011 the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation 2010 30 Day Post-General Report (Unauthorized Committees) as recommended in the Reports Analysis Division's Memorandum dated June 27, 2011, on the following committees:

AF#2382 Decided by a vote of 6-0 to: (1) make a final determination that PRIORITY PAC, and KENNEDY, KEVIN MR. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2386 Decided by a vote of 6-0 to: (1) make a final determination that SOUTH DAKOTA FIRST, and MCINTYRE, JOHN as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2388 Decided by a vote of 6-0 to: (1) make a final determination that TEXAS TEA PARTY PATRIOTS PAC, and WILLIAM J O'SULLIVAN JR as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2354 Decided by a vote of 6-0 to: (1) make a final determination that CHIANG PATEL AND YERBY INC PAC, and DAVID W HAYS as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2363 Decided by a vote of 6-0 to: (1) make a final determination that GOLDEN PEANUT COMPANY, LLC POLITICAL ACTION COMMITTEE, and JAMES W DORSETT as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2369 Decided by a vote of 6-0 to: (1) make a final determination that INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE, and MARTIN MASCUILLI as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2384 Decided by a vote of 6-0 to: (1) make a final determination that SEABOARD CORPORATION POLITICAL ACTION COMMITTEE, and DAVID M DANNOV as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2350 Decided by a vote of 6-0 to: (1) make a final determination that ASPLUNDH TREE EXPERT CO POLITICAL ACTION COMMITTEE (ATE PAC), and DWYER, JOSEPH P as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2348 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN TELESERVICES ASSOCIATION PAC, and KOBEK, ROBERT as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2376 Decided by a vote of 6-0 to: (1) make a final determination that METROPOLITAN TRANSPORTATION AUTHORITY POLICE BENEVOLENT ASSOCIATION PAC, and RAYMOND GIMMLER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2387 Decided by a vote of 6-0 to: (1) make a final determination that SUFFOLK COUNTY DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE, and WILLIAM RATHJEN, TREASURER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2351 Decided by a vote of 6-0 to: (1) make a final determination that BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC), and IRA LAMEL as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2362 Decided by a vote of 6-0 to: (1) make a final determination that FULTON FINANCIAL CORPORATION PAC, and MICHAEL J DEPORTER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2383 Decided by a vote of 6-0 to: (1) make a final determination that RENEWABLE ENERGY SYSTEMS AMERICAS INC. PAC (AKA RESPAC), and MILLER, LINDSAY MURRAY as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2385 Decided by a vote of 6-0 to: (1) make a final determination that SILK PAC, and LISA MARTINEZ as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2349 Decided by a vote of 6-0 to: (1) make a final determination that AMERICANS FOR NEW LEADERSHIP, and BRENT HUSSON as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2380 Decided by a vote of 6-0 to: (1) make a final determination that PHILADELPHIA JOINT BOARD UNITE HERE TIPS, and MS MILDRED SALDANA as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2375 Decided by a vote of 6-0 to: (1) make a final determination that MCAPIOTOL MANAGEMENT / MWH AMERICAS PAC, and PAYNE, G. THOMAS as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2389 Decided by a vote of 6-0 to: (1) make a final determination that TEXTILE RENTAL SERVICES ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (TRSAPAC), and NEWELL, THOMAS as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2359 Decided by a vote of 6-0 to: (1) make a final determination that D C REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE, and ENGLE, CRAIG as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2346 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN GAMING ASSOCIATION POLITICAL ACTION COMMITTEE, and PATTERSON, JUDY LAYNE as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2392 Decided by a vote of 6-0 to: (1) make a final determination that UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG CARPENTERS LEGIS EMP CMTE, and GLENN MARSHALL as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2344 Decided by a vote of 6-0 to: (1) make a final determination that ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC), and SUTHERBY, DANIEL J. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2356 Decided by a vote of 6-0 to: (1) make a final determination that CONSOLIDATED EDISON INC EMPLOYEES' POLITICAL ACTION COMMITTEE (CEIPAC), and MUCCILO, ROBERT as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2366 Decided by a vote of 6-0 to: (1) make a final determination that HARRIS COUNTY REPUBLICAN PARTY, and FLYNN, JOSH as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2372 Decided by a vote of 6-0 to: (1) make a final determination that KENTUCKY MEDICAL ASSOCIATION PAC (KENTUCKY PHYSICIANS PAC FEDERAL-KPPAC FEDERAL), and WATKINS, DAVID R MD as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2371 Decided by a vote of 6-0 to: (1) make a final determination that IUOE OPERATING ENGINEERS, and JAMES JONES as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2345 Decided by a vote of 6-0 to: (1) make a final determination that ACE CASH EXPRESS INC PAC, and DAVID DODSON as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2347 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN MOTORCYCLIST POLITICAL ACTION COMMITTEE, and CHADDOCK, ROBERT as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2357 Decided by a vote of 6-0 to: (1) make a final determination that CONTINUING AMERICA'S STRENGTH AND SECURITY PAC, and STEPHENS, RALPH J. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2358 Decided by a vote of 6-0 to: (1) make a final determination that CORINTHIAN COLLEGES INC PAC, and DE GIUSTI, PAUL as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2360 Decided by a vote of 6-0 to: (1) make a final determination that EFFECTIVE LEADERSHIP PAC, and DENISE PETERSON as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2365 Decided by a vote of 6-0 to: (1) make a final determination that GREAT LAKES SUGARBEET GROWERS POLITICAL ACTION COMMITTEE, and VANDRIESSCHE, RAY as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2367 Decided by a vote of 6-0 to: (1) make a final determination that HEARPAC OF HEARING INDUSTRIES ASSOCIATION, and RUZICKA, JEROME as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2370 Decided by a vote of 6-0 to: (1) make a final determination that INTERNATIONAL SECURITIES EXCHANGE PAC, and COOPERMAN, BRUCE as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2373 Decided by a vote of 6-0 to: (1) make a final determination that LIBERTARIAN PARTY OF INDIANA, and TODD SINGER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2374 Decided by a vote of 6-0 to: (1) make a final determination that MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE, and LYLE J PARRY as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2378 Decided by a vote of 6-0 to: (1) make a final determination that MSCPAC, and RAYMOND J BRIYA as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2379 Decided by a vote of 6-0 to: (1) make a final determination that OLD NATIONAL BANK PAC, and BRENDON FALCONER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2390 Decided by a vote of 6-0 to: (1) make a final determination that THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE, and GLAZIER, MITCH as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2391 Decided by a vote of 6-0 to: (1) make a final determination that TRANSPORTATION INTERMEDIARIES ASSOCIATION'S TIAPAC, and ROBERT A VOLTMANN as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2394 Decided by a vote of 6-0 to: (1) make a final determination that USINPAC, and PURI, SANJAY K as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2395 Decided by a vote of 6-0 to: (1) make a final determination that WOMEN'S CAMPAIGN FORUM, and SIOBHAN BENNETT as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 30, 2011
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 2011

Brendon Falconer, in official capacity as Treasurer
Old National Bank PAC
1 Main Street
Evansville, IN 47708

C00165282
AF#: 2379

Dear Mr. Falconer:


On March 25, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Old National Bank PAC and its treasurer violated 2 U.S.C. § 434(a) for filing late or failing to file the 2010 Post-General Report. By letter dated March 28, 2011, the Commission sent notification of the RTB finding that included a civil money penalty calculated at the RTB stage of \$550 in accordance with the schedule of penalties at 11 C.F.R. § 111.43.

On May 4, 2011, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on June 29, 2011 that you, in your official capacity as treasurer, and Old National Bank PAC violated 2 U.S.C. § 434(a), assessed a civil money penalty in the amount of \$550 in accordance with 11 C.F.R. § 111.43, and voted to close the file.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Sari Pickerall on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,


Cynthia L. Bauerly
Chair


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QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 002 \$ 0000055000 BA# 1 05-04-11 20 3



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| <small>THIS CHECK IS VOID WITHOUT A COUNTERSIGNED AND SIGNED ORIGINAL CHECK. PLEASE HOLD AT AN ANGLE TO VIEW.</small> | |
|  OLD NATIONAL BANCORP P.O. BOX 718 EVANSVILLE, INDIANA 47705 | 201099 CHECK NUMBER |
| | 05/02/11 DATE |
| FIVE HUNDRED FIFTY DOLLARS AND 00/100 | |
| PAY TO THE ORDER OF | DOLLARS \$550.00 |
| FEDERAL ELECTION COMMISSION US BANK - GOVERNMENT LOCKBOX FEC #979058 1005 CONVENTION PLAZA ATTN: GOV LOCKBOX, SL-MO-C2GL ST. LOUIS MO 63101 | <i>Cheryl Kelly</i> Chief Financial Officer |



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2379

DATE SCANNED 9/7/11

SCANNER NO. 2

SCAN OPERATOR EEJ

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